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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ERIC HALVORSON, LAURA FERRER, PETER
DALLMAN, ROBERT GRANA, DENNIS
BULCAO, and NEIL YOUNG, individually, as
representatives of the classes, and on behalf of the
general public,

Plaintiffs,

v.

TALENTBIN, INC.,

Defendant.

Case No. 3:15-cv-05166-JCS

**STIPULATION TO EXTEND
TIME FOR FILING MOTION
FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT AND CONTINUE
CASE MANAGEMENT
CONFERENCE**

STIPULATION TO EXTEND TIME FOR FILING MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT AND CONTINUE CASE MANAGEMENT CONFERENCE
CASE NO. 3:15-cv- 05166-JCS

Pursuant to Civil Local Rule 6-1(b), plaintiffs Eric Halvorson, Laura Ferrer, Peter Dallman, Robert Grana, Dennis Bulcao, and Neil Young (“Plaintiffs”) and defendant TalentBin, Inc. (“Defendant”), through their undersigned counsel, hereby stipulate as follows:

WHEREAS, on August 19, 2016, the parties filed a Notice of Settlement and Stipulation to Vacate Litigation Deadlines;

WHEREAS, the Court set a September 19, 2016 deadline for the parties to file for preliminary approval of the settlement;

WHEREAS, the Court set a Case Management Conference for September 23, 2016 at 2pm;

WHEREAS, the parties require additional time to complete the confirmatory discovery agreed to as part of the settlement;

WHEREAS, the parties are near to executing, but have not yet executed a formal settlement agreement memorializing the terms agreed to at mediation;

WHEREAS, the parties agree that they require 30 days to complete the confirmatory discovery, to execute the settlement agreement, and to prepare a motion for preliminary approval;

WHEREFORE, the parties request that the Court extend the deadline to file for preliminary approval to October 19, 2016 and continue the Case Management Conference until a date thereafter that is convenient for the Court.

Pursuant to Local Rule 6-1(b), the parties request that the deadline for filing for preliminary approval be extended to October 19, 2016 and continue the Case Management Conference to a date thereafter that is convenient for the Court.

Dated: September 13, 2016

MORRISON & FOERSTER LLP

By: /s/ Angela E. Kleine

Angela E. Kleine

Attorneys for Defendant
TALENTBIN, INC.

1 Dated: September 13, 2016

BERGER & MONTAGUE, P.C.

2 By: /s/ John G. Albanese

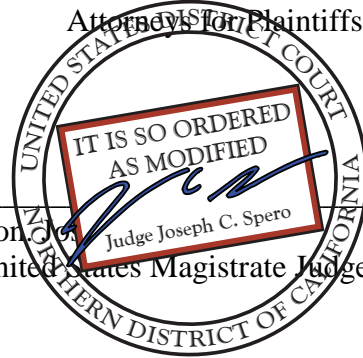
3 John G. Albanese

4 Attorneys for Plaintiffs

5 **IT IS SO ORDERED.**

6 Date: 09/14/16

7 Hon. Judge Joseph C. Spero
8 United States Magistrate Judge



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11 IT IS HEREBY FURTHER ORDERED that the further case management conference, set for
12 Sept. 23, 2016, at 2:00 PM has been continued to Oct. 28, 2016, at 2:00 PM. An updated joint
13 case management conference statement shall be filed by Oct. 21, 2016.
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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1

I, John G. Albanese, am the ECF User filing this STIPULATION TO EXTEND TIME FOR FILING MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND CONTINUE CASE MANAGEMENT CONFERENCE. In compliance with Civil Local Rule 5-1, I hereby attest that Angela E. Kleine concurred in this filing.

Dated: September 13, 2016

/s/ John G. Albanese

John G. Albanese

Attorney for Plaintiffs